## 

CRIMINAL COMPLAINT (Electronically Submitted)

<b>United States District Court</b>	DISTRICT of ARIZONA
United States of America v.  Julian Gabriel PALAFOX Valdez  DOB: 2002; United States Citizen	DOCKET NO.
	MAGISTRATE'S CASE NO.  23-03106NJ

Complaint for violation of Title 18, United States Code, § 554(a)

On or about August 5, 2023, in the District of Arizona, **Julian Gabriel PALAFOX Valdez** knowingly and fraudulently exported and sent from the United States, and attempted to export and send from the United States, any merchandise, article, or object contrary to any law or regulation of the United States, and received, concealed, bought, sold, and in any manner facilitated the transportation, concealment, and sale of such merchandise, article or object, that is: one (1) M4 rifle grip and four (4) 5.56 magazines, knowing the same to be intended for exportation contrary to any law or regulation of the United States, to wit: Title 50, United States Code, Section 4819; Title 15, Code of Federal Regulations, Parts 736.2, 738, and 774; all in violation of Title 18, United States Code, Section 554(a).

## BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:

On August 5, 2023, **Julian Gabriel PALAFOX Valdez** attempted to exit the United States and enter the Republic of Mexico through the Douglas Port of Entry in Douglas, Arizona. Customs and Border Protection Officers (CBPOs) were conducting outbound inspections when they stopped a black Dodge Ram with a California license plate driven by **Julian Gabriel PALAFOX Valdez**. **PALAFOX** had a passenger with him. CBPOs selected the vehicle for a random inspection and asked PALAFOX where he was headed. **PALAFOX** stated he was headed to Agua Prieta, Mexico to visit family for the weekend. CBPOs asked **PALAFOX** if he was traveling with any ammunition, weapons or weapon parts, and any currency more than \$10,000 to which **PALAFOX** stated that he was not. **PALAFOX** stated he was just coming from his home in California.

CBPOs instructed **PALAFOX** and his passenger to exit the vehicle to conduct a physical inspection of the vehicle. During the inspection CBPOs found one (1) M4 rifle grip and four (4) 5.56 magazines underneath the driver seat.

During a post-Miranda interview, PALAFOX stated that he forgot the magazines and grip were inside his truck. PALAFOX stated that he was supposed to turn them in to the armory at his military base on Friday but that the armorer told him to wait until Monday. PALAFOX consented to a search of his phone. During a manual search of the phone, text messages were found between PALAFOX and his father regarding the magazines and grip. PALAFOX sent a picture of the magazines and grip to his father asking if he wanted it and his father stated, "yes bring it". PALAFOX was asked about the text messages, and he stated that the magazines and grip were not meant

## (BASIS OF COMPLAINT CONTINUED ON REVERSE.) MATERIAL WITNESSES IN RELATION TO THE CHARGE: N/A DETENTION REQUESTED Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge. AUTHORIZED BY AUSA R. Arellano Pague Challano Digitally supred by AAOUEL ARELLAND Date: 08/06/2023 OFFICIAL TITLE HSI Task Force Officer Brian Valle Sworn by telephone x SIGNATURE OF MAGISTRATE JUDGE 1) DATE August 7, 2023

## (BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED CONTINUED)

for his father. **PALAFOX** stated he did not have an export license for those type of things and understood it was illegal to take weapon and weapon parts into Mexico.

The firearm part and magazines found in the vehicle qualify as United States Commerce Control List items and therefore are prohibited by law for export from the United States into Mexico without a valid license. **PALAFOX** does not possess a license to export firearm parts or magazines into Mexico.